

Case: 19-01007 Doc: 4 Filed: 02/05/19 Page: 1 of 3

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE:

MELODY NAKINA LEWIS,

Case No. 18- 14388 SAH  
(Chapter 7)

Debtor.

---

IAN'S ENTERPRISE, LLC, an Oklahoma  
limited liability company,

Plaintiff,

VS.

Adv. Pro. No. 19-01007

MELODY NAKINA LEWIS,

Defendant.

---

**ANSWER TO COMPLAINT FOR DETERMINATION OF DISCHARGEABILITY AND  
PURSUANT TO RULES 7054(b)(1) & (b)(2)FOR COST AND ATTORNEY FEES TO BE  
AWARDED TO DEFENDANT**

**COMES NOW** the Defendant, Melody Nakina Lewis, by and through her attorney of record Stephen A Harry, and for her Answer to the Complaint of Dischargeability, filed January 18, 2019, Doc # 17, states and alleges as follows, with numerical reference to the complaint of Plaintiff:

1. Defendant has insufficient information as to admit or deny.
2. Admitted
3. Admitted
4. Admitted
5. This allegation is irrelevant, and does not require either an admission or a denial.

6. Admitted
7. Denied, Defendant never received any legal notice of any default.
8. Denied, statement is irrelevant.
9. Admitted that Defendant agreed to pay rent to Plaintiff but denies any default to Plaintiff.
10. Denied and statement is irrelevant.
11. Defendant admits to completing rental information forms several years prior to stated judgment.
12. Denied
13. Defendant denies providing false information to Plaintiff. Defendant's prior employer and criminal case is not irrelevant and is prejudicial against the Defendant.
14. Admitted and again irrelevant and prejudicial.
15. Admitted as to the irrelevant suspended sentence and denied the amount stated in monetary penalty.
16. Denied and demand strict proof to this allegation.
17. Defendant was never served any law suit and denies allegation.
18. Defendant lacks sufficient information to deny or admit to this allegation.
19. Denied
20. The Defendant, with permission from the Court, reserves the right to file such additional defense as may become apparent during the course of discovery.

WHEREFORE, premises considered, Defendant prays this Court Deny the Plaintiff's complaint, that this Court grant judgment over and against the Plaintiff, such that the Plaintiff takes nothing by his complaint, for attorney's fees and cost of this matter and for any other and further relief to which the Defendant may be entitled to under law.

Case: 19-01007 Doc: 4 Filed: 02/05/19 Page: 3 of 3

Respectfully submitted,

/s/ Stephen A Harry

Stephen A Harry, OBA # 20499  
4101 Perimeter Center Dr. Suite 110  
Oklahoma City, OK 73112  
405-384-8746—phone  
405-214-1486---fax  
[stephenaharry@sahlawoffice.com](mailto:stephenaharry@sahlawoffice.com)

Attorney for the Melody Lewis